REMARKS

In accordance with the foregoing, claims 1-2, 11-12, and 14 are amended. No new matter is presented in any of the foregoing and, accordingly, approval and entry of the amended claims are respectfully requested.

Claims 1-2 and 4-15 are pending and under consideration.

Claim Amendments

Claims 1-2, 11-12, and 14 are amended herein to replace "a condition of a pattern of a character string of plain text data as an extraction condition" with the phrase --a condition of a pattern within a character string of plain text data as an extraction condition-- (emphasis added).

Support for the amendment is found in, for example, FIGs. 25 and 26 and page 25, line 16 - page 29, line 7. No new matter is presented in any of the foregoing and, accordingly, approval and entry of the amended claims are respectfully requested.

Items 5-1 and 5-2: Rejection of Claims 1, 2 and 4-15 under 35 U.S.C. §103(a)

In items 5-1 and 5-2 of the Office Action, the Examiner rejects independent claims 1-2, 11, 12, and 14 (and dependent claims 4-10, 13, and 15) under 35 U.S.C. §103(a) as being unpatentable over combinations of Kuwahara (U.S.P. 6,202,072) alone and in view of Nakatsuvama et al. (U.S.P. 5,752,021).

The rejections are traversed. Applicant respectfully submits that the recited features are not taught by the cited art, alone or in combination, that *prima facie* obviousness is not established. The Applicant submits the Examiner continues to err in his interpretations of the cited art, and of the current application in support of the rejections.

Condition Of A Pattern Within A Character String Not Taught By Cited Art

Independent claim 1, as amended herein, recites "defining a correlation between elements as basic units configuring the document structure, and defining, for each of the elements, a condition of a pattern within a character string of plain text data as an extraction condition." Independent claim 2, 11-12, and 14, all as amended herein, have similar recitations.

Applicant submits that neither Kuwahara nor Nakatsuyama's teaching of a retrieval formula teaches a "pattern within a character string of plain text data."

Rather, Nakatsuyama merely teaches (see, for example, col. 3, starting at line 1):

> (w)hen a user of the database...retrieves documents...he needs to...specify the name of a document component ("P" for a document of "Type C", for example) representative of a paragraph defined by the schema, and construct a retrieval formula using that name.

That is, a retrieval formula specifying a name of a document is not a "pattern within a character

string" of plain text data.

In the section entitled Response to Arguments, the Examiner incorrectly interprets:

> Kuwahara's determination of a coincidence and correlation of fields of the document tags as equivalent to the claimed 'condition of a pattern' because in order to determine a coincidence and correlation of fields, some condition must be in place to make the decision that there is a coincidence or correlation of fields.

(Action at pages 13-14).

That is, the Examiner incorrectly interprets the correlation of Kuwahara of a field to a tag as teaching a pattern. Further, the Examiner contends that Kuwahara teaches:

> "a structure document generating module ... the definition information" by teaching (i.e., generate a SGML document from a plain text document prepared by a user as part of the two directional conversion between plain text document and a SGML document having a specific form).

(Action at page 6).

Applicant submits that the Examiner errs in his interpretation of Kuwahara. Rather, this cited teaching of Kuwahara does not teach a generation of a structured document by adding to each region an identifier defined by the definition information, as recited by claim 1 for example.

No Motivation To Combine The Art In Manner Suggested

Further, Applicant submits that the Examiner's conclusory statements in support of a combination, and motivation for the same, are contrary to the stated purpose of the cited art. That is, Applicant respectfully submits that accordingly the Examiner's proposed combinations would not have been obvious to one of ordinary skill in the art.

In support of rejection of claim 1, the Examiner incorrectly contends it would have been obvious to modify Kuwahara:

> to include retrieval conditions on the basis of the retrieval formula for defining the structure of document data as taught by Nakatsuyama, providing the benefit of a document retrieving means to perform retrieval using semantic description and the schema relating to the first schema and directed to the first retrieval and converts the first formula to a second formula.

(Action at page 7).

However, Kuwahara discloses instead:

> The apparatus for processing SGML document according to the present invention generates a conversion form for conversion between a prototype document having a specific form and a document type definition by correlating structural elements in the prototype document to those in the document type definition respectively . . . For this reason a conversion form corresponding to the specific form may be generated only once, and since it is not required to prepare samples such as components, markup documents, and document type definitions every time as in the case of the conventional technology, it is possible to improve the workability thereof.

(Emphasis added, col. 2, lines 29-35).

That is, the Examiner's suggested combinations are contrary to the intent of Kuwahara and would not be obvious to one of ordinary skill in the art, and do not establish *prima facie* obviousness.

Defining Correlation Between Elements As Basic Units Not Taught By Cited Art

Independent claim 12 recites, in addition, a method of conversion including "reading plain text data; (and) reading definition information that defines a correlation between elements as basic units configuring a document structure of a structured document." Applicant submits that such a definition is not taught by the cited art, alone or in combination.

The Examiner contends that Kuwahara teaches, citing col. 5, lines 1-18 and lines 59-65:

> reading definition information that defines a correlation between elements as basic units configuring a document structure of a structured document.

(Action at page 10).

Applicant submits the Examiner errs in his interpretation of Kuwahara. Rather, Kuwahara merely teaches (see, for example, col. 5, lines 60-65):

> by correlating a corresponding document structure in the document type definition with each of the fields for department and address respectively, it is possible to obtain data for correlation therebetween. Finally, by correlating an application form and the document type definition to data for correlation therebetween as one unit, a SGML conversion form is prepared.

That is, Kuwahara does not define a correlation between elements as basic units, as the Examiner contends.

Repetitive Structure Not Taught By Cited Art

Further, dependent claims separately recite features that distinguish over the cited art. For example, claim 4 recites a system wherein "said correlation between the elements shows a hierarchical structure in which said element in a higher-order hierarchy embraces an element in a lower-order hierarchy that has a repetitive structure."

The Action concedes that Kuwahara does not teach a "repetitive structure." (Action at page 3). In support of the rejection, the Examiner contends Kuwahara teaches in col. 2 lines 45-50:

> that the prior art teaches a repetitive structure (i.e., conventional technology generates every time for the entire document type definition processing instead of only once).

(Action at page 3).

However, claim 4 further recites that it is "an element in a lower-order hierarchy that has a repetitive structure" and then because of the element having such a repetitive structure that

there is the "retrieving module repeatedly extracts regions."

The paragraph cited in Kuwahara (col. 2, lines 35-50) by the Examiner merely discusses:

> (t)he apparatus for processing SGML document according to the present invention generates . . . by using the prototype document is converted to a SGML document. For this reason a conversion form corresponding to the specific form may be generated only once, and since it is not required to prepare samples such as components, markup documents, and document type definitions every time as in the case of the conventional technology.

(Emphasis Added).

That is, Kuwahara merely indicates that the "repeating" of the conventional technology that the invention improves on is a repeated preparation of samples such as components, markup documents and document type definitions every time a document is processed. Kuwahara does not teach "an element in a lower-order hierarchy that has a repetitive structure," and then, because of the element having such a repetitive structure that there is the "retrieving module repeatedly extracts regions."

Further, the Examiner mistakenly contends that it is possible to modify Kuwahara:

> to include(s) generating conversion tables every time (instead of once) as suggest in the prior art of conventional technology, providing the benefit (of) correlating fields of the prototype document to tags of the document type definition when converting plain text to SGML.

(Action at page 4).

Applicant submits there is no motivation to even *arguendo* modify Kuwahara to perform a repetitive process since Kuwahara clearly teaches that because:

> a conversion form corresponding to the specific form may be generated only once . . . it is possible to improve the workability thereof.

Retrieving A Region Just After An Already-Extracted Region Not Taught By Cited Art

Dependent claim 5 recites a structural documentation system "wherein said correlation between the elements shows a hierarchical structure in which one element in a higher-order hierarchy embraces a plurality of sequenced elements in a lower-order hierarchy and said retrieving module extracts each region coincident with one of said extraction conditions of the elements in the lower-order hierarchy with reference to the extraction condition of the sequenced element in the lower-order hierarchy out of a region from a portion just after an already-extracted region coincident with another extraction condition of the element in lower-order hierarchy within the region extracted with reference to the extraction condition of the element in its higher order hierarchy." Applicant submits that such a retrieving is not taught by the cited art.

The Examiner contends that Kuwahara teaches "said retrieving module extracts . . .

coincident with one higher order hierarchy" since:

> in order to have a specific form, there must be some condition of specificity in order to perform the conversion which is found out from the document type definition.

(Action at page 5).

Applicant submits that the Examiner's contention is incorrect and not properly supported. While the Action concedes that Kuwahara does not teach "each region" as recited by claim 5 the Examiner contends that Kuwahara teaches that "prior art teaches a repetitive structure. . .and it would be obvious to modify Kuwahara to include(s) generating conversion tables every time."

Applicant submits there is no stated motivation to even *arguendo* modify Kuwahara to perform a repetitive process, as the Examiner contends.

Summary

Since *prima facie* obviousness is not established, the rejection should be withdrawn and claims 1, 2 and 4-15 allowed.

CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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